UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

	. X	
UNITED STATES OF AMERICA	:	
-against-	:	Hon. Jed S. Rakoff
MONZER AL KASSAR, TAREQ MOUSA AL GHAZI, and LUIS FELIPE MORENO GODOY	:	S3 07 Cr. 354 (JSR)
Defendants.	:	
	X	

NOTICE OF MOTION FOR RULE 15 DEPOSITIONS

PLEASE TAKE NOTICE, that on behalf of defendants Monzer Al Kassar, Tareq Mousa Al Ghazi, and Luis Felipe Moreno Godoy (collectively, "Defendants"), the undersigned counsel will move this Court, at a session to be held before the Honorable Jed S. Rakoff, at the Moynihan Federal Courthouse, located at 500 Pearl Street, New York, New York, on a date and time to be determined by the Court, for an order granting Defendants' motion to take the depositions of Jose Villarejo, Assuman Munyantore, and Juan Manuel Rodriguez pursuant to Rule 15 of the Federal Rules of Criminal Procedure.

Dated: New York, New York

July 7, 2008

Respectfully submitted,

DICKSTEIN SHAPIRO, LLP

By:

Ira Lee Sorkin Nicole DeBello Elliott Z. Stein

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To: Honorable Jed S. Rakoff Roger Stavis, Esq. Marc Agnifilo, Esq. AUSA Boyd Johnson AUSA Leslie Brown AUSA Brendan McGuire